

intimidated or bullied into compliance with misrepresentation, threats, and baseless accusations.

Regards,
Ashley Richardson

<image0.jpeg>
<image1.jpeg>

Sent from my iPhone

On Jul 31, 2025, at 3:13 AM, Harrison, Todd <Tdharrison@mwe.com> wrote:

Ms. Richardson - I am on a family vacation and not available for a meet and confer. In addition, as I have stated before, I am not obligated to be at your beck and call and immediately respond to you in less than twenty-four hours, as you suddenly demand below. This is especially true in a case where you have wholly ignored your discovery obligations for almost a year now. For instance, you were served with our Interrogatories on September 12, 2024, and you still have not responded to them in any way, in spite of our subsequent repeated requests. It seems clear that you have not responded because you have no evidence or specifics whatsoever to support your vague counterclaim. You also have not responded to the deficiency letter we sent to you regarding the clear deficiencies in your document production. Answer the interrogatories as you are obligated to do and then I will be happy to have a meet and confer regarding all of the open discovery issues.

Sincerely, Todd Harrison

TODD HARRISON
Partner

[McDermott Will & Emery LLP](#) One Vanderbilt Avenue, New York, NY 10017-3852
Tel +1 212 547 5727 | Mobile +1 917 797 1728 | Email tdharrison@mwe.com
[Website](#) | [vCard](#) | [Twitter](#) | [LinkedIn](#)

On Jul 29, 2025, at 4:36 PM, Ashley Richardson <ashrichardson@mac.com> wrote:

[External Email]

Dear Todd,

I write pursuant to our obligation to meet and confer regarding Plaintiff Taylor Thomson's July 7, 2025 responses and objections to Defendant's First Set of Requests for Production of Documents.

After reviewing Plaintiff's responses, I must express serious concern over the pattern of blanket objections, evasive language, and refusal to produce clearly relevant materials. Plaintiff appears to be withholding responsive documents critical to the defense and counterclaims—including but not limited to:

- Communications between Plaintiff and Defendant concerning the trades and investment agreement (RFP 4–5, 13)
- Plaintiff's rationale, due diligence process, and third-party input regarding the investment (RFP 10–12)
- Documents related to the Singapore lawsuit and the now-dismissed California protective order (RFP 15–17)
- Communications with third parties regarding media inquiries or coverage (RFP 18)

These documents go directly to the heart of the claims and defenses in this case and are not shielded by any valid privilege or overbreadth objection. The attempt to deflect on relevance is especially concerning given Plaintiff's own use of similar materials in public statements and court filings.

I have been making efforts to produce documents, and continue to. To date, Ms. Thomson has produced no documents.

Let me be clear: if Plaintiff continues to refuse production of these materials, I will have no choice but to move to compel and request sanctions for bad faith discovery practices.

Please let me know your earliest available for a meet and confer, no later than EOD Wednesday July 30th.

Sincerely,
Ashley Richardson

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Please visit <http://www.mwe.com/> for more information about our Firm.

EXHIBIT E

Ashley Richardson
October 28, 2025

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,)	
)	
Plaintiff,)	Case No.:
)	2:23-CV-04669-MEMF-MAR
v.)	
)	
PERSISTENCE TECHNOLOGIES)	
BVI Pte Ltd., et al.,)	
)	
Defendants.)	
_____)	

VIDEOTAPED DEPOSITION OF ASHLEY RICHARDSON

October 28, 2025

11:10 a.m.

REPORTED BY:

Tammy Moon, CSR No. 13184, RDR, CRR

Ashley Richardson
October 28, 2025

1 APPEARANCES:

2 FOR PLAINTIFF TAYLOR THOMSON:

3 MCDERMOTT WILL & SCHULTE LLP
4 BY: TODD HARRISON, ESQ.
5 BY: JOSH YIM, ESQ.
6 BY: JOE EVANS, ESQ. (REMOTE)
7 One Vanderbilt Avenue
New York, New York 10017
212.547.5767
Tdharrison@mwe.com

8 FOR DEFENDANTS PERSISTENCE TECHNOLOGIES BVI Pte
9 Ltd., et al.:

10 IN PRO PER
11 BY: ASHLEY RICHARDSON
12 25399 Markham Lane
13 Salinas, California 93908
Ashrichardson@mac.com

14 ALSO PRESENT: TAYLOR THOMSON, PLAINTIFF (REMOTE)
15 CAMPBELL HERBERT, MCDERMOTT WILL & SCHULTE (REMOTE)
16 DIANA FELL-SHARMA, THE VIDEOGRAPHER
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Ashley Richardson
October 28, 2025

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ASHLEY RICHARDSON

Tuesday, October 28, 2025

Tammy Moon CSR No. 13184, RPR, CRR

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Ashley Richardson
October 28, 2025

1 Tuesday, October 28, 2025, 11:10 a.m.

2 THE VIDEOGRAPHER: We are on the record at
3 11:10 Pacific Standard Time, on October 28, 2025.

4 Audio and video recording will continue to
5 take place until all parties agree to go off the
6 record. Please note that microphones are sensitive
7 and may pick up whispers and private conversations.

8 This is the video recorded proceedings of
9 Ashley Richardson, taken by counsel for plaintiff,
10 Todd Harrison, in the matter of Taylor Thomson v.
11 Persistence Technologies BVI Pte Ltd., filed in the
12 United States District Court, for the Central
13 District of California.

14 We are located at 415 Mission Street, Suite
15 5600 in San Francisco, California.

16 My name is Diana Fell-Sharma. I am a
17 videographer on behalf of U.S. Legal Support,
18 located at 16825 North Chase Drive, Suite 900,
19 Houston, Texas 77060. I am not related to any party
20 in this action nor am I financially interested in
21 the outcome.

22 The court reporter is Tammy Moon, on behalf
23 of U.S. Legal Support.

24 Counsel will state your appearances for the
25 record, after which the court reporter will enter

Ashley Richardson
October 28, 2025

1 the statement for recorded proceedings into the
2 record and swear in the witness.

3 MR. HARRISON: Hi. Todd Harrison from
4 McDermott Will and Schulte for the plaintiff. With
5 me is my associate, Josh Yim. On video are my
6 colleagues, Joe Evans and Campell Herbert. Also
7 zooming in by video is the plaintiff Taylor Thomson.

8 THE REPORTER: This is Tammy Moon,
9 Certified Stenographic Reporter 13184.

10 ASHLEY RICHARDSON,
11 called as a witness, having been duly sworn,
12 testified as follows:

13 THE WITNESS: I do.

14 MR. HARRISON: Can we just check the folks
15 on the -- can you hear us, folks, on Zoom? There's
16 no audio for the Zoom.

17 MR. YIM: Joe is muted right now.

18 MR. HARRISON: Joe, can you hear us now?

19 THE VIDEOGRAPHER: He nodded yes.

20 MR. HARRISON: Can you say something so we
21 can make sure we can hear you.

22 MR. EVANS: Testing. Testing.

23 MR. HARRISON: Got it. Thank you.

24 (Reporter clarification.)

25 EXAMINATION BY MR. HARRISON, COUNSEL FOR PLAINTIFF

Ashley Richardson

October 28, 2025

1 Q. Good morning, Ms. Richardson.

2 A. Good morning.

3 Q. We are going to start a little late. It's
4 11:13 now. I just want to go over some brief ground
5 rules for the deposition, some basic stuff. It's
6 important for the court reporter that we not talk
7 over each other. So I'll talk, then you talk. I'll
8 talk, then you talk.

9 If there's anything about my questions that
10 are unclear, just ask me to clarify them, and I'll
11 clarify them or change the question. I'm happy to
12 do that.

13 You are appearing pro se in this case,
14 right?

15 A. That's correct.

16 Q. And so you have no lawyer here today,
17 correct?

18 A. That's correct.

19 Q. Okay. By choice. No one stopped -- we
20 haven't stopped your lawyer from coming or anything,
21 right? You are appearing by choice without a
22 lawyer?

23 A. That's correct.

24 Q. Okay. You do realize that the deposition
25 today is being videotaped and audio recorded, okay?

Ashley Richardson

October 28, 2025

1 A. I do.

2 Q. And you do realize that you are under oath,
3 so you are obliged to tell the truth?

4 A. I do.

5 Q. And that if you don't, it could be
6 considered a crime of perjury, correct?

7 A. I understand.

8 Q. What's your full legal name?

9 A. Ashley Elizabeth Richardson.

10 Q. Okay. Have you ever gone by any other
11 names?

12 A. Not legally.

13 Q. What's your current permanent address?

14 A. It is 25399 Markham Lane. And it's either
15 Corral de Tierra or Salinas. They both are the
16 same, true. California 93908.

17 Q. Okay. And do you own that home?

18 A. No.

19 Q. Who owns that house?

20 A. The trust.

21 Q. And who owns the trust? Who has an
22 interest in the trust?

23 A. I have an interest in the trust and my
24 sister.

25 Q. Okay. So it's 50/50 between the two?

Ashley Richardson

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1 A. Yes.

2 Q. Okay. Where did you live before that?

3 What was your residence before that?

4 A. My residence before that was 3748 Redwood
5 Avenue in Los Angeles, California.

6 Q. Okay. And who owned that residence?

7 A. I -- myself and my partner, my former
8 partner.

9 Q. Okay. And is that Michele Fleury --

10 A. Correct.

11 Q. -- if I'm pronouncing her name correctly?

12 And did you -- so you had a 50/50 ownership
13 in that house as well?

14 A. Correct.

15 Q. Okay. And did you sell that house?

16 A. Yes.

17 Q. Okay. How much did you guys sell it for?
18 I don't need exact dollar amount, but approximately.

19 A. It was approximately -- I think the
20 selling -- gosh, I believe it was 1.8 or 1.85. I
21 think it was 1.8.

22 Q. And what's the value of the house that you
23 live in now, the residence that you live in now?

24 A. It's approximately 1.1 with a mortgage.

25 Q. How big is the mortgage?

Ashley Richardson

October 28, 2025

1 A. I believe it's \$500,000, but I don't have
2 access to it, so I could not tell you for sure.

3 Q. We've corresponded with you using the email
4 address ashrichardson@mac.com; is that right?

5 A. Yes.

6 Q. Okay. And there's -- I think there's one
7 other that we have corresponded with you on.

8 Is there another email address that you
9 have?

10 A. There was another email address that I had
11 that was a business email address. That was -- I
12 can't remember it exactly because I don't use it.
13 It was either ashley or
14 ashleyrichardson@cypresspeakproductions.

15 Q. @cypresspeakproductions?

16 A. Mm-hmm. And you guys have a number of
17 emails you use on the emails to me, but none of
18 those are emails I use or active. I think I may
19 have like -- I don't know where they came from.
20 Probably you guys did a -- I assume -- a search, but
21 they're not active emails that I use.

22 Q. Okay. And how long have you had the
23 ashrichardson@mac.com email address?

24 A. I could not tell you. I -- it's a long
25 time.

Ashley Richardson

October 28, 2025

1 Q. Okay. More than five years?

2 A. More than five years.

3 Q. Okay. Do you still have access to any of
4 the other accounts that you have referenced? Any
5 other prior email accounts?

6 A. Do I have access? I mean, I don't know if
7 it exists still because I'm not in control. So I
8 could not answer that question. I apologize.

9 Q. Okay. I want to turn quickly to your
10 educational history.

11 Can you just give me your educational
12 history, please, your educational background?

13 A. Sure. I graduated from high school in
14 1996. I went to, for a few years, to a community
15 college and then to UC Berkeley. And I dropped out
16 of college to move to India. So I never -- I never
17 completed. I completed about three years of my
18 college education.

19 Q. Okay. What year was that that you dropped
20 out of Berkeley to go to India?

21 A. I'm not positive, but I believe it was --
22 it was either 1999 or 2000, approximately. I
23 couldn't tell you with certainty.

24 Q. And I think you were in India for a number
25 of years; is that correct?

Ashley Richardson

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1 A. That's correct.

2 Q. And what were you doing in India?

3 A. I was doing, primarily, volunteer work and
4 a lot of meditating and -- and fundraising for an
5 organization.

6 Q. Okay. And I take it you were volunteering
7 and meditating and things and not making a
8 significant amount of income; is that correct?

9 A. I made no income.

10 Q. Okay. And when did you come back from
11 India?

12 A. It would have been -- I -- I visited
13 periodically throughout that time. Are you -- I
14 guess I want to clarify what the question is asking.

15 Q. That's a good point. If anything I ask you
16 is not clear, go ahead and ask me to clarify.

17 When did you -- I guess when did you
18 permanently, if you have a point of time in your
19 mind, when you permanently moved back from India?

20 A. That would have been the end of 2003.

21 Q. Okay.

22 A. I can't remember the exact date.

23 Q. Can we hand her a copy of the -- of the
24 résumé, please.

25 So we are handing you a copy of what's been

Ashley Richardson

October 28, 2025

1 marked as Exhibit 136.

2 (Exhibit 136 was marked for identification.)

3 Q. I believe this is your LinkedIn résumé; is
4 that correct?

5 A. I have no idea what it is.

6 Q. You have never seen this before?

7 A. I -- I wasn't aware that I had a LinkedIn
8 résumé, so --

9 Q. Well, this is you, correct?

10 A. That's me, yes.

11 Q. Okay.

12 A. I just -- I don't know where you got this
13 from or where -- where it -- where I -- I uploaded
14 it from.

15 Q. Sure. So there's two pages. So go ahead
16 and take a look at it. Take a look at the second
17 page.

18 A. Okay.

19 Q. And so we got it off of LinkedIn. So do
20 you -- you must have made a LinkedIn profile at some
21 point, correct?

22 A. I -- I definitely made a LinkedIn profile
23 at some point.

24 Q. And this LinkedIn in profile that we handed
25 you, which is Plaintiff's Exhibit 136, does that

Ashley Richardson
October 28, 2025

1 accurately describe your employment history?

2 A. I -- I think it's -- I can't say with
3 certainty that the specifics are accurate. I
4 believe that this is a snapshot of my employment
5 history, the basics of it. Those are all positions
6 I have held, yes.

7 Q. Okay. And I -- you would have created this
8 LinkedIn -- excuse me. Withdrawn.

9 You said previously that you did -- you do
10 remember creating a LinkedIn profile résumé, right?

11 A. I do. I do.

12 Q. And it looks like this is it. Would you
13 agree with me?

14 A. It is. And I would say that what is
15 inconsistent, because I didn't even realize it was
16 there, are the areas marked "Present," because I
17 have not been active on LinkedIn in for quite some
18 time, and the "Present" positions are not accurate.

19 Q. Okay. So let me run through a little bit
20 of this.

21 Can you just briefly walk me through the
22 jobs that you've had here, starting Irwin Naturals?

23 A. Sure. Irwin Naturals was the first job I
24 had when I came back from India. It was a sales
25 position. I started off as an inside sales rep and

Ashley Richardson

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1 became the sales manager within the first six
2 months, because I was the top performer, and then I
3 became the VP of international sales.

4 Q. And during your time at Irwin Naturals --
5 I'm not asking you to give me a specific dollar
6 figure, but approximately how much were you earning
7 per year?

8 A. I would say between 60 and 120,000,
9 depending on the year that I was there.

10 Q. Okay. And then -- your next job is
11 Essential Living Foods. Just briefly, what were you
12 doing there?

13 A. I was overseeing the marketing and also the
14 sales teams, and I was helping with the new brand
15 creation of aligned products that were being taken
16 to market.

17 Q. Okay. And how big was that company,
18 Essential Living Foods?

19 A. I could not tell you the size. It was --
20 we had distribution throughout Whole Foods and, you
21 know, the national food sector. So it wasn't mass
22 market, but it was -- it was substantial.

23 Q. Okay. And how much, approximately, were
24 you making per year there?

25 A. I will say it was -- I think between 120

Ashley Richardson

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1 and 150,000, but I can't tell you with certainty.

2 It's been so long.

3 Q. Okay. The next one listed here is
4 Cuculoris Films, from October of 2008 to May 2011,
5 marketing director. What were you doing there?

6 A. I was overseeing the -- I was mostly
7 working on new business for a commercial director,
8 and I was traveling to ad agencies and hearing new
9 businesses through clients like Ford Motors and
10 Sunny Delight and other -- other corporate clients.

11 Q. Okay. And what approximately were you
12 making at that job?

13 A. That job, I was not making much. I took it
14 because I wanted the opportunity to get into a
15 different sector. And I believe I was making less
16 than 5,000 a month, but I cannot remember the
17 specific.

18 Q. Okay. And the next one is EQAL, director
19 of business development. What was that? And what
20 were you doing there? I'm sorry. Before you get to
21 that, I'll withdraw it.

22 Let me ask you one more question about
23 Cuculoris. It looks like they're defunct now as far
24 as I can tell. Is that company out of business?

25 A. Yeah. The person who ran the company

Ashley Richardson

October 28, 2025

1 passed away and, yeah, it no longer exists.

2 Q. Sounds like it was a small company. Is
3 that correct?

4 A. I mean, it was -- it was small when we
5 weren't in production. And when we were in
6 production, we obviously brought on a lot of
7 freelance employees, you know, production specific.

8 Q. Okay. The next one EQAL, director of
9 business development. What were you doing there?

10 A. EQAL, I was overseeing sales. It was for a
11 company that was doing early-stage social media
12 marketing. So primarily they were focused on
13 campaigns. It was -- it was early days of social.
14 We were actually building social networks for
15 brands. It was before we -- I think, people
16 realized everybody had to be on a social network.
17 So we would build out a specific social network,
18 like for Kraft or for a number of other brands. And
19 I worked in -- you know, I worked directly with
20 clients. Presentations, sales, and talent liaison.

21 Q. Okay. And how much, approximately, were
22 you making per year there?

23 A. That, I took a pay cut for because I wanted
24 to get in the door. It was just a little less than
25 six figures, but I can't tell you the exact number

Ashley Richardson

October 28, 2025

1 because I don't remember. I just remember I took a
2 pay cut to do it.

3 Q. Okay. It looks like that company is out of
4 business too. Is that right?

5 A. Yeah, I think so.

6 Q. Okay. The next one is VP of brand
7 integrations, September 2013 to August 2014.

8 What were you doing there? I'm sorry. Let
9 me make sure I understand this. Can you -- if you
10 look at it, is this --

11 (Simultaneous colloquy.)

12 A. That's under theAudience. Yes.

13 Q. Okay. So you were at theAudience, and it
14 looks like you started out as VP of brand
15 integrations for a year, 2013 to 2014, and then you
16 were an SVP.

17 Can you just describe very briefly what you
18 were doing there?

19 A. Sure. I was -- it was a similar type of
20 position. I was overseeing the sales for primarily
21 the A-level clients. So I -- I started off working
22 with all of the key accounts, and then I hired and
23 managed salespeople throughout the country. So we
24 had key markets in New York, Chicago, San Francisco,
25 Los Angeles, and I would fly consistently to those

Ashley Richardson

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1 markets to meet with clients.

2 We did integrated branded campaigns with
3 social media and celebrity, but we also were on the
4 early phase of the influencer movement. So we -- we
5 would bring together a lot of young kids who were
6 on -- at the time Vine was popular and YouTube. And
7 we would sort of cross-populate them to become, you
8 know, more popular --

9 Q. Okay.

10 A. -- through, you know, intersections.

11 Q. And is that company no longer active?

12 A. That's true.

13 Q. Okay. How much were you making,
14 approximately, per year while you were there?

15 A. I was making between 250 and -- and 400,000
16 a year.

17 Q. Okay. And then it looks like you left that
18 to go do Roof Dog Digital Consulting, which you were
19 the owner, it looks like.

20 A. Roof Dog was -- was more of a side gig for
21 me. I was starting to do some side consulting
22 projects in the film and television industry,
23 primarily social media. And so it wasn't full time.
24 It was just my own sort of, you know, side business.

25 Q. Okay. And how much did you make doing --

Ashley Richardson

October 28, 2025

1 well, withdrawn.

2 Are you still doing that? It says to the
3 present here.

4 A. It's -- I'm not. That's incorrect.

5 Q. How long did you do Roof Dog Digital
6 Consulting for?

7 A. On and off. I would say -- I could not
8 tell you specifically, but I began -- I do remember
9 beginning it around 2012. And it was very sporadic.
10 It wasn't consistent.

11 Q. Okay.

12 A. But it was like a umbrella under which I
13 could do, kind of, side consulting gigs and --

14 Q. So during the times that you were working
15 through Roof Dog, how much, approximately, were you
16 making per year just on Roof Dog alone?

17 A. Probably less than 20,000.

18 Q. Okay. And then the next thing on here is
19 InsUrgent Media where it says you were a partner
20 from September 2015 to present.

21 Is that accurate? Are you still there or
22 --

23 A. No, it's not.

24 Q. Okay. When did you stop being --
25 (Simultaneous colloquy.)

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1 A. We shut down when the pandemic began.

2 Shortly after the pandemic began.

3 Q. Okay. So you were there from about 2015 to
4 end of 2019, beginning of 2020?

5 A. No. It would have been like April of 2020.

6 Q. Okay. And how much, approximately, were
7 you making per year there?

8 A. I was making -- I think a base of 250 and,
9 you know, plus some additional.

10 Q. Okay.

11 A. And that's approximate. I don't want to
12 lock into an absolute because I can't remember the
13 exact number, but it was roughly 250.

14 Q. Okay. And then the last one is -- excuse
15 me -- Cypress Peak Productions, where it says you
16 were partner. And that was from June 2020 to when?

17 A. I would say it's -- it's very vague. This
18 was -- so Cypress Peak Productions is my
19 ex-partner's production company. And during the
20 pandemic, I began to help and -- you know, managing
21 talent. And we started to try to, you know, get
22 creative in bringing on new business. So I would
23 say it's hard to quantify what the end date would
24 have been because I always helped, you know, where I
25 could, but it was very limited. I would say 2020 to

Ashley Richardson

October 28, 2025

1 2021 would have been the majority of, you know, the
2 help I -- I provided.

3 Q. Okay. And while you were there,
4 approximately how much were you making per year?

5 A. I did not make much. I contributed a lot
6 to the company. Like I said, it was a -- my partner
7 was a sole proprietor, and I think I made less than
8 six figures.

9 Q. Okay.

10 A. But it was full-time. I took it on as a
11 full-time commitment from, I would say, May 2020 --
12 and this is an approximate -- until about -- until
13 the time -- right about the time I started, you
14 know, helping Taylor with everything.

15 Q. Okay. And just briefly, what did Cypress
16 Peak Productions do?

17 A. Their primary business is photo shoot
18 production and commercial production -- both
19 commercial but, you know, still photos and moving
20 picture.

21 Q. Okay. Did you file tax returns for all the
22 years that we talked about here with these different
23 jobs?

24 A. Not the -- not the latest one. Not the
25 last -- Cypress Peak. But the others, yes.

Ashley Richardson

October 28, 2025

1 Q. Okay. Why didn't you file tax returns when
2 you were at Cypress Peak? You didn't --

3 A. It just -- it just didn't help. Like,
4 I'm -- I just haven't finished all of my taxes. I
5 think most of the Cypress Peak -- 2020 was filed but
6 not 2021.

7 Q. Okay. So the -- is that -- the last year
8 that you filed taxes is 2020?

9 A. I have not had income since then. So,
10 yeah, that's correct. I will file this year, and I
11 will file for those other -- but I haven't been
12 receiving and -- I haven't been making money.

13 Q. Okay. And so that's why you didn't file
14 income tax returns for '21 through whenever, is
15 because there was -- there wasn't sufficient income
16 to require you to file a tax return?

17 A. That's correct. And also, I just -- it was
18 2022. It's that, and just life, I think, you know,
19 became a little bit unmanageable.

20 Q. Is the -- is the IRS aware that you haven't
21 filed taxes?

22 A. Yes, I have talked to them. I'm in the
23 process of filing.

24 Q. Okay. What -- what'd you do to prepare for
25 your deposition today?

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1 A. I mean, I did a lot of -- I did a lot of
2 TikTok videos. You'd be surprised. There's some
3 good stuff on TikTok --

4 Q. Okay.

5 A. -- YouTube. And, you know, I talked to
6 some friends who've been deposed.

7 Q. Okay. Any of them lawyers?

8 A. Any of the lawyers that I spoke to would be
9 lawyers that are my lawyers. So I would consider
10 that privileged, and I would object to answering
11 that question.

12 Q. How many lawyers do you have?

13 A. I have two lawyers and -- actually, that's
14 not true. Three.

15 Q. What are the names of your lawyers?

16 A. You are aware. Nick Gravante is one.

17 Q. Okay.

18 A. And in a -- completely unrelated matters,
19 Leigh Rodriguez.

20 Q. Okay. And what unrelated -- so he doesn't
21 represent you in this matter?

22 A. No, no.

23 Q. What other matters does he represent you
24 in?

25 A. Just -- just the estate matters. He's a --

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1 he's a local Monterey County lawyer. He's only been
2 helping me with -- since, I want to say, September
3 or the end of August. I can't give you an exact
4 date, but recent.

5 Q. Okay. And who is the third, I think you
6 said?

7 A. Philip Kaplan.

8 Q. Okay. And who is Philip Kaplan?

9 A. He is someone who's represented me in the
10 past, and I did not talk to him about this
11 deposition. But that would be privileged if I had.

12 Q. If -- okay. Maybe. What did Philip Kaplan
13 represent you on in the past?

14 A. He represented me on an employment suit
15 against theAudience.

16 Q. Okay. And what was the basis for that
17 employment suit? What was the issue?

18 A. The issue was I was not paid fairly for
19 a -- when we sold the company.

20 Q. So when you say "we sold the company,"
21 were -- did you have part ownership in theAudience?

22 A. No -- well, I had a stake in theAudience.

23 Q. Okay. And what was the amount and
24 controversy? How much were you saying theAudience
25 should have paid you more?

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1 A. I cannot remember the specifics of that
2 case. It's been a while, so I -- to have to -- I
3 don't see how it's relevant to this matter.

4 Q. Well, several ways. So you've put your
5 finances at issue, right? You've said that you are
6 destitute now because of the claims that you made.

7 A. Yes.

8 Q. So your finances are at issue. And my next
9 question is did you get deposed in that case? Have
10 you been deposed previously?

11 A. No, no.

12 Q. Have you ever been deposed before?

13 A. I -- I want to qualify this. I do not
14 believe I did. I was -- I was in a small traffic
15 collision. I cannot tell you the exact year, but it
16 would have been -- it would have been between 2005,
17 I think, and 2007. I went to an office with
18 lawyers. And before it started, they looked at
19 pictures, I believe, of the car, and then they ended
20 up not questioning me. So I don't think that I was
21 sworn in. I don't -- but I can't remember exactly.
22 I just know I went to -- I think it was to be
23 deposed, and then it stopped out of the gate, and I
24 wasn't questioned.

25 Q. Okay. So now back to my original question,

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1 which is who did you -- so who did you consult with
2 or talk to about preparing for your deposition
3 today?

4 A. I just answered that question.

5 Q. Well, you said you -- we got on a different
6 track. You said you had three attorneys. So now
7 I'm just going back to the original question. So if
8 I'm understanding, then -- so you talked to
9 Mr. Gravante about the deposition today?

10 A. I didn't say that. My --

11 (Simultaneous colloquy.)

12 Q. Withdrawn. Let me just ask you the
13 question again. You can answer --

14 A. Yes.

15 Q. -- however you think is correct. Who did
16 you talk to to prepare for the deposition today?

17 A. And -- and as I said, asked and answered.
18 I object to that question. I just told you I talked
19 to several friends who have been deposed in the
20 past. And as it relates to counsel, that
21 information is privileged. I did the majority of my
22 deposition prep based off of publicly available
23 materials.

24 Q. Okay. So who were the friends that you
25 talked to about your deposition today?

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1 A. I talked to a woman named Eydie Saleah.

2 Q. Okay. And who is she?

3 A. She is a friend who lives in New York City
4 who was in a major accident once upon a time and was
5 deposed.

6 Q. Okay. Who else?

7 A. I can't tell you with certainty because
8 I'm -- honestly can't think -- I haven't really -- I
9 talked very briefly with my mother about it, who was
10 a paralegal.

11 Q. Okay.

12 A. But it was very brief.

13 Q. So did you talk to any attorneys about your
14 deposition today?

15 A. I believe that is privileged.

16 Q. Well, it's not privileged. I'm not asking
17 you the substance of any communications you had, and
18 I'll never ask you about the substance of any
19 communications you had with any lawyer that is
20 representing you on this case. But the first step
21 is I'm asking you if you consulted with any lawyers
22 about your deposition today. I'm not asking you the
23 substance of any potential conversations, just
24 whether you consulted with any lawyers.

25 A. Yes.

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1 Q. Okay. Which lawyers did you consult with
2 about your deposition today?

3 A. I -- I consulted with -- very briefly with
4 Nick Gravante.

5 Q. Okay. Any other attorneys?

6 A. No.

7 Q. Okay. Did you review documents before
8 coming to the deposition today?

9 A. I -- I attempted to with the time that was
10 available to me, but I've -- I don't think I went
11 through everything. I went through as much as I
12 could.

13 Q. Okay. And you have, it looks like, spent a
14 lot of time on filings in this case, correct?

15 A. That is correct.

16 Q. Okay. And you -- when you made filings in
17 this case, like your answer and your counterclaims
18 and your answers to interrogatories, I assume you
19 were trying to be as accurate as you could be. Is
20 that right?

21 A. I -- I hope so.

22 Q. Okay. And I assume that you were trying to
23 be as thorough as you could be in your answers,
24 correct?

25 A. I'm not a lawyer, so I -- I'm doing the

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1 best of my ability through -- through research
2 and -- and through what I can gather. But -- but I
3 put my best effort forward.

4 Q. Right. And it's not really a
5 lawyer-related question. The question is you tried
6 to be as thorough as possible in the filings that
7 you have made in this case, correct?

8 A. I -- I guess I'm not understanding what you
9 mean by "thorough" because -- because I don't know,
10 like, what -- what that means. I mean, I'm sure
11 there's areas where I missed things and where I
12 could have been probably more thorough or I could
13 have done a better job. But I -- I'm not sure I
14 understand the question.

15 Q. Well, the question is you tried to be as
16 thorough as you could be, correct?

17 A. I have a hard time answering this question
18 simply because I feel like it's completely
19 subjective, and there could always be a way that
20 somebody could be more thorough.

21 Q. But we are not talking about somebody else.
22 We are talking about you when you were putting your
23 answers together and filings together in this case.
24 I assume -- it's really not a trick question.

25 A. Yeah.

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1 Q. I assume you tried to be as thorough as you
2 could be. Or did you not try to be as thorough as
3 you could be?

4 A. I put my best effort forward, yes.

5 Q. Okay. And I assume you tried to be as
6 accurate as -- as you could be in the -- all of the
7 filings that you have made in this case?

8 A. That is correct. I don't think that I
9 always -- you know, I think that there was a lot of
10 room for improvement because oftentimes the time
11 constraints or my limited understanding -- but I --
12 I gave it my best.

13 Q. Okay. And some of the filings that you
14 have made in this case have been filed under oath,
15 right, and signed by you. So I assume you
16 understand the importance of filing things under
17 oath, correct?

18 A. I -- I think I do.

19 Q. Okay. And so you understand the importance
20 of being as accurate as possible when you file
21 things, particularly when it's under oath and signed
22 by you, correct?

23 A. Yes.

24 Q. Okay. Let me turn now to -- you have -- I
25 want to talk about your counterclaims for a second.

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1 So you have -- you have propounded two different
2 types of counterclaims, right? The defamation
3 counterclaim and an intentional infliction of
4 emotional distress, right?

5 A. That's correct.

6 Q. Okay. On the defamation counterclaim, can
7 you please tell us what you allege to be the
8 specific defamatory statements that Ms. Thomson made
9 that have defamed you.

10 A. I will try to be as thorough as possible,
11 but I want to preface this by saying I -- this is --
12 you know, won't include everything and, you know, to
13 the best of my knowledge and ability and also the
14 pressure of this moment to answer it thoroughly.
15 Top of mind are the allegations, you know, very
16 simply, directly in the lawsuit that were spoken
17 about to people in shared circles -- social circles,
18 professional circles, as alleged. So that one is
19 very easy to quantify because all of those
20 allegations are documented.

21 And I have already -- I have already given
22 my position that I deny those allegations, for the
23 most part, as being false; that -- further to the
24 allegations that are in the lawsuit themselves, that
25 I'm a grifter, that I defrauded her, that she had no

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1 understanding of a potential finder's fee, that
2 there were secret kickbacks -- essentially, all of
3 these allegations that I did anything untoward in
4 relation to her investing in Persistence.

5 Q. Okay. But those are the allegations that
6 the plaintiff in the case has made against you.

7 A. Right.

8 Q. And I understand that you are denying
9 those. What I'm asking is you have also made
10 allegations back against Ms. Thomson, correct --

11 A. Yes.

12 Q. -- for defamation and intentional
13 infliction of emotional distress?

14 A. Yes.

15 Q. So for the defamation claim, what are the
16 actual statements that you say that Ms. Thomson made
17 about you that were publicized that were defamatory
18 and defamed you or hurt you in a negative way? What
19 are the actual statements?

20 A. Can you clarify if the question is relating
21 to publications specifically or -- because this
22 is -- I feel like it's a compound question, and I
23 want to -- I want to answer it correctly. And if
24 it's -- if it's --

25 Q. Sure. So I'll rephrase it.

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1 A. Thank you.

2 Q. What are the -- what are the statements
3 that you allege that Ms. Thomson made that are
4 defamatory?

5 A. I can't say with certainty the exact
6 statement. I can say the substance of the
7 statement, but I -- I don't want to be called to
8 speculate because I wasn't there physically with
9 her. So I do feel like this is causing for
10 speculation. Could you maybe rephrase the question
11 in a way that I can answer it without potentially
12 coming -- you know, I don't want to say something --
13 because that's a specific question.

14 Q. Sure. I mean, it's pretty clear,
15 Ms. Richardson, and you know it's pretty clear. And
16 you know you have been trying to avoid answering
17 this question for a year. So the question is pretty
18 basic. You allege that Ms. Thomson defamed you by
19 making statements that were defamatory against you
20 and hurt you negatively, correct?

21 A. Yes, yes, that's correct.

22 Q. Okay. What are they? What are the
23 statements that you allege that Ms. Thomson made?

24 A. Is there a way to rephrase the question so
25 that it's not specific? Like, I -- I can give you,

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1 basically, the -- the areas of focus, the -- the
2 meaning. But are you asking for verbatim
3 statements? I just want to clarify on the question.

4 Q. I'm asking for your best understanding or
5 best knowledge --

6 A. Okay.

7 Q. -- of what these vaguely alleged defamatory
8 statements are. It's your burden -- I hope you
9 understand this. It's your burden when you make an
10 allegation to give supporting evidence for that
11 allegation.

12 A. Absolutely.

13 Q. So all we are asking you -- all I'm asking
14 you is what are the statements?

15 A. I understand. I'm just trying to make sure
16 that I'm not put in a position where I'm saying
17 something that can be used against me because of a
18 technicality. So when you say "statements," like --
19 and I don't have something that shows the exact
20 words, if that would be an issue. So if you -- if
21 you are saying to me that I am answering this
22 question to the best of my understanding, with the
23 knowledge that these are not direct quotes -- is
24 that correct?

25 Q. I don't know what you know, but I'm asking

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1 you: What's your best knowledge? What do you know
2 about any potentially or allegedly defamatory
3 statements?

4 A. Okay.

5 Q. That's it. It's pretty simple.

6 A. I know that -- I know that Taylor alleges
7 that she knew nothing about there being any kind of
8 finder's fee. I know that Taylor has alleged
9 that -- and this -- I want to -- I want to preface
10 this by saying this is to the best of my memory and
11 not a complete list -- that I -- that I had ill
12 intentions throughout our friendship; that I was
13 trying to take advantage of my best friend who had
14 cancer; that I did anything untoward throughout the
15 trading process that wasn't trying to help her; that
16 I lied or stole -- was a thief, was a grifter.

17 These are very substantial allegations that
18 imply extreme malice and, you know, like, ill intent
19 from my part. And -- and to tell people that -- not
20 just this action that happened within this specific
21 time frame but that there was this whole lead-up
22 throughout our friendship of more than a decade
23 is -- is very harmful to me, to my -- to my standing
24 professionally, to my standing in our social
25 circles. I know that she said -- I know that she

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1 said that -- sorry. I just need a second to collect
2 my thoughts.

3 Q. Let me ask you this, Ms. Richardson. So
4 almost everything you've recounted so far is just
5 regurgitating Ms. Thomson's allegations in this
6 case. Yes, most of the things you have talked
7 about -- in answers to the same repeated question
8 that I have asked you today, you are just
9 regurgitating what Ms. Thomson's allegations are in
10 the litigation. Is that what we are talking about?
11 Are you -- do you allege that the allegation that
12 Ms. Thomson makes in the lawsuit are the defamatory
13 statements you are talking about? Is that -- is
14 that what we are talking --

15 A. No.

16 Q. Okay.

17 A. But that is part of it.

18 Q. Then what are -- then what are the
19 defamatory statements? So in order to carry a claim
20 for defamation, you need to say that someone made a
21 specific statement on a relatively specific day.
22 You have to tell the substance of the statement, who
23 the statement was made to, and why it's defamatory.

24 A. These statements have been going on for
25 years -- continue to -- as well as in the past three

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1 months -- six months to press outlets; to, you know,
2 third parties. So this is not a -- this is not
3 something that happened in a single time frame.
4 Defamation is not quantified by a single actual
5 statement. My testimony is evidence. My lived
6 experience and loss of professional opportunities
7 and an entire social circle, including the
8 relationship I had with her daughter, is -- is the
9 evidence. And I can go into the specifics that I
10 know. But to say that --

11 Q. That's fine. What specifics do you know?
12 What specific statements do you have information on
13 that Ms. Thomson made to anyone that you allege were
14 defamatory to you?

15 A. I just told you a couple of big ones.

16 Q. You didn't tell us any specific statements.
17 You made -- you made general allegations.

18 A. Okay.

19 Q. You didn't say any specific statements.

20 A. Specifically, she said that I took
21 advantage of our friend who had cancer, which is the
22 opposite of the truth. She also said that I am a
23 grifter. I don't know how that could be seen as
24 anything other than defamatory. She said that she
25 should have suspected ill intent from my side all

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1 along; that looking back, there were signs. And it
2 is highly relevant that she has accused me of theft
3 and fraud outside of this lawsuit and disseminated
4 that information, which I am saying is false.

5 Q. Okay. So let me walk through those. You
6 are saying that Ms. Thomson made a statement that
7 you took advantage of Beau when Beau had cancer?

8 A. That's correct.

9 Q. Okay. Who are you alleging that
10 Ms. Thomson made that statement to?

11 A. Mutual friends of ours.

12 Q. Okay. Which mutual friends?

13 A. I believe Ron Murphy, Kevin -- I can't
14 think of his last name -- Madeleine Thomson, Rand
15 Rusher. Probably others, including -- but, you
16 know, I'm -- those -- those are the ones that I
17 believe, you know, are the core because that was our
18 shared -- you know, our shared social circle.

19 Q. Okay. So you are really just making a list
20 of Taylor Thomson's friends right now, correct?

21 A. No.

22 Q. Okay. Have you talked to Ron Murphy, and
23 did he tell you about any allegedly defamatory
24 statements that Taylor Thomson made to you -- made
25 about you?

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1 A. I have not talked to him directly, no.

2 Q. So how do you know as you sit here today
3 that Taylor Thomson made defamatory statements to
4 Ron Murphy about you?

5 A. Well, I know that because Ron Murphy was
6 one of my closest friends. And there's no way that
7 he would have cut off all contact if Taylor had not.

8 Q. Okay. But Ron Murphy has never told you, I
9 take it, that Taylor Thomson made any defamatory
10 statements to him about you. Is that correct?

11 A. Not directly.

12 Q. How -- how -- did he do it indirectly?

13 A. No.

14 Q. Okay. Okay. Kevin -- I think it's
15 Fitzgerald, you said -- is the next person?

16 A. Yes, I believe that's correct.

17 Q. Okay. Have you talked to Kevin --
18 withdrawn.

19 Has Kevin Fitzgerald told you that Taylor
20 Thomson made defamatory statements about you to him?

21 A. No.

22 Q. Madeleine Thomson. Has Madeleine Thomson
23 told you that Taylor Thomson made defamatory
24 statements about you to her?

25 A. Indirectly, yes.

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1 Q. How did she do that indirectly?

2 A. She texted me, in our last text exchange
3 that we had, that she was upset with me because what
4 I had done to mother, and we had a heated exchange
5 where I -- around that. And that was not anything
6 that came from me and it wasn't anything that came
7 from Madeleine's own understanding so that would
8 have come from Taylor.

9 Q. It would have come from Taylor. So you are
10 -- you are guessing that Taylor made a defamatory
11 statement --

12 A. It had to have come from Taylor.

13 Q. Why did it have to have come from Taylor?

14 A. Because I know the structure of those
15 relationships intimately, and there's no other way
16 that Madeleine -- and the intense closeness that I
17 had with Madeleine for over a decade.

18 Q. Okay. But just so we are clear, Madeleine
19 Thomson has never told you directly that Taylor
20 Thomson made a defamatory statement about you to
21 Madeleine?

22 A. I would say indirectly it was -- it was
23 clear that defamatory statements had been made based
24 on the history of our relationship and the way that
25 things took a turn.

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1 Q. Okay. But you are not aware of any
2 specific defamatory statement? You are sort of
3 guessing from the circumstances; is that correct?

4 A. I'm aware because they had to do with
5 everything that led up to the lawsuit and the
6 allegations.

7 Q. I don't even know what that means: "They
8 had to do with everything." What does that mean?

9 A. Can you rephrase the question?

10 Q. You said that the -- you've said that
11 Madeleine Thomson told you indirectly and you
12 extrapolated or insinuated from the circumstances
13 and your past knowledge of the history of your
14 relationships that Taylor Thomson, you think, must
15 have probably made a defamatory to Madeleine; is
16 that correct?

17 A. That's not what I said, no.

18 Q. Well, you agree -- you agree with me that
19 you said you don't know of any defamatory statement
20 that -- any specific defamatory statement that
21 Taylor Thomson made to Madeleine Thomson, correct?

22 A. Based on -- based on the extreme closeness
23 and the nature of our relationships, I know without
24 a shadow of a doubt that defamatory statements were
25 made about me from Taylor Thomson to Madeleine

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1 Thomson and that those statements would reveal
2 themselves if the production that I requested was
3 actually produced.

4 Q. Okay. So if you know without a shadow of a
5 doubt, what were the statements?

6 A. The statements include that I defrauded
7 Taylor and it -- we are not talking -- I don't know
8 the specific statements. That's not how defamation
9 is quantified. Defamation is quantified by the
10 impact to the individual and the general
11 understanding.

12 Q. That's not at all what defamation is, to
13 begin with.

14 A. There are --

15 Q. Secondly, we are not talking about
16 quantification yet. I'll get there.

17 We are talking about what the actual
18 defamatory statements are. You realize I'm not
19 asking about quantification, like how much you think
20 you should get for a defamatory statement. We are
21 talking about the fact that you don't appear to have
22 any evidence of any defamatory statements of any
23 specific defamatory statements. That's what I'm
24 trying to get at.

25 A. I disagree.

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1 Q. What you have said about Madeleine is you
2 extrapolated indirectly from a text message that
3 Madeleine sent you; is that correct?

4 A. No.

5 Q. Okay. Then tell me what was the statement
6 that Madeleine Thomson told you that Taylor Thomson
7 made to her that was defamatory about you.

8 A. I can't --

9 Q. What did Madeleine Thomson tell you?

10 A. I can't recall. This was a text message
11 that was sent several years ago. So I would have to
12 go back and check, but I -- I know that there were
13 several things that were stated. I -- I can't
14 recall that.

15 Q. Okay. Is -- have you produced that text
16 message in this litigation?

17 A. I can't remember if I did or not. It was
18 on my list of things to put in the folder, but I was
19 pulling hundreds of -- of text messages and
20 documents.

21 Q. Okay. So we have talked about Ron -- you
22 listed Ron, Kevin, Madeleine, Rand Rusher.

23 Has Rand Rusher told you that Taylor
24 Thomson made a specific defamatory statement to him
25 about you?

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1 A. I cannot recall.

2 Q. Okay. And you said there's probably
3 others, but you don't know that there are any
4 others, correct?

5 A. I do know that there are others.

6 Q. Okay. Who -- who else is there that you
7 allege, to support your allegations in this lawsuit,
8 that Taylor Thomson made a defamatory statement
9 about you? Who else?

10 A. I've said repeatedly that, due to the
11 nature of Ms. Thomson's wealth and her retaliatory
12 nature, there are certain people that I'm
13 uncomfortable naming, and that I would consider
14 doing it under seal but with protection.

15 One person specifically who I did a lot of
16 work with and who was a very close mutual friend,
17 although she was much closer with me, and that's
18 Catherine Hardwicke.

19 Q. Okay. And what did -- what do you allege
20 that Taylor Thomson said to Catherine Hardwicke that
21 was defamatory to you? Withdrawn.

22 What -- have you talked to Catherine
23 Hardwicke and has Catherine Hardwicke told you about
24 any specific defamatory statement that Taylor
25 Thomson made to her about you?

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1 A. Yes.

2 Q. Okay. What was the statement?

3 A. I can't recall the specific statement, but
4 it involved that I committed fraud and theft.

5 Q. Okay. When did you have this conversation
6 with Cat Hardwicke?

7 A. I can't tell you exactly, but it would have
8 been about a year ago probably. Maybe more -- maybe
9 a little bit more. Within the last two years.

10 Q. Was it before or after this litigation
11 started?

12 A. After.

13 Q. Okay. How long after?

14 A. No, actually -- probably right at the
15 beginning.

16 Q. What do you mean by "the beginning"?
17 Before the original complaint was filed?

18 A. I think it was probably before my complaint
19 was filed, but your complaint was filed.

20 Q. So it was --

21 A. I can't -- I can't tell you with certainty.

22 Q. Okay.

23 A. I don't even want to speculate, because I
24 -- I know the conversation -- the conversation
25 happened after the market crashed. That, I can tell

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1 you with certainty.

2 Q. Which -- which market crashes are you
3 talking about?

4 A. The crypto market crash of 2021 -- 2020 --
5 sorry -- '22.

6 Q. When -- when in 2022 was that?

7 A. The market crash?

8 Q. Mm-hmm.

9 A. The -- the substantial crash occurred
10 between, I would say, January and May of 2022, but
11 the -- the largest, I think, specific major part of
12 the crash would have been between, I think, March
13 and May. I would have to look. I can't tell you
14 with certainty.

15 Q. Okay.

16 A. I know that it happened throughout 2022.

17 Q. And how did you come to that conversation
18 with Cat Hardwicke?

19 A. I had not heard from her. She had not been
20 responding to me, which was very unlike her. We
21 were very close. And then when I heard from her,
22 she told me that.

23 Q. How did you hear from her? If she hadn't
24 been responding, how did you hear from her?

25 A. I believe that I texted her, and I said I

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1 was having a really hard time. And I think she felt
2 for me. And then that was the last time I followed
3 up with her since then and didn't hear from her.

4 Q. Okay. And did you talk in person? On the
5 phone? How did you talk?

6 A. It was over the phone.

7 Q. It was on the phone. And what was the
8 phone number that you were using to make that call?

9 A. I can't tell you with certainty, but I
10 think that it would have been my regular phone
11 number.

12 Q. And what is that?

13 A. (310)490-2476.

14 Q. How long have you had that phone number?

15 A. I've had it for a long time.

16 Q. Okay. Do you have any other phone numbers?
17 Any other cell phones?

18 A. I did briefly.

19 Q. When was that?

20 A. It was -- it was during the -- I don't know
21 when it would have been exactly. So I -- I would
22 say, roughly, I think, between 2022 and '24.

23 Q. You said you had it briefly, but how long
24 did you have that cell phone for?

25 A. I don't know exactly. I would say there

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1 was like a few months. It was -- it was a second
2 phone number. Because I had reason to believe that
3 Taylor was listening to my devices, so I got a
4 second phone.

5 Q. And -- we can come back to that. Why did
6 you stop -- how long did you use that second phone
7 for?

8 A. Briefly.

9 Q. How brief?

10 A. I don't know. It would have been months,
11 because I think it was like maybe a few months. And
12 then I didn't -- you know, I let it lapse. It was
13 like a -- kind of one of those pay-as-you-go.

14 Q. Okay. And what was the phone number on
15 that phone?

16 A. No idea.

17 Q. Do you have records of that -- for that
18 phone anywhere?

19 A. Not that I know of, but I might.

20 Q. Okay. We'll send you a follow-up letter
21 after this, but we are going to ask for you to turn
22 your cell phone records over.

23 A. Okay.

24 Q. What carrier did you use for these two
25 phones?

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1 A. I believe -- I don't -- I didn't handle the
2 phone bill because I was on a family plan, but I
3 think it was Verizon. I know at one point we were
4 on AT&T. So it was either/or, like, at each time.

5 Q. Okay. So Cat Hardwicke. And what -- what
6 did Cat Hardwicke -- what do you say that Cat
7 Hardwicke told you specifically about this
8 defamatory statement that you say Taylor Thomson
9 made about you? What did Cat Hardwicke tell you
10 exactly?

11 A. I -- I object to the question, because I
12 couldn't tell you anything anybody told me over the
13 phone that long ago exactly.

14 Q. Okay. Have you talked to Cat Hardwicke
15 since that conversation?

16 A. No.

17 Q. Have you communicated with her at all since
18 that conversation?

19 A. No.

20 Q. Okay. You said there may be others that
21 might know about defamatory statements. Who -- who
22 else could potentially know about defamatory
23 statements related to this case?

24 A. Shiro Gutzie, Offer Waterman.

25 Q. Let me rephrase or ask a different

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1 question. It sounds like, again, you are just
2 listing names of people that Taylor Thomson knows
3 and you are assuming that Taylor Thomson made
4 defamatory statements about. Is that correct?

5 A. No.

6 Q. Okay. So what my question is -- what are
7 the specific defamatory statements that you are
8 alleging in this litigation Taylor Thomson made
9 about you? So if you have names of people who you
10 are alleging Taylor Thomson made specific defamatory
11 statements to, I'm -- that's my question. My
12 question is not who are Taylor Thomson's list of
13 friends that you think might have heard something
14 bad.

15 A. I'm not sure that I understand what it is
16 that you are asking for.

17 Q. I think you do. I think you are very clear
18 about what I'm asking for because we have been
19 asking for it for a year leading up to this
20 deposition. But the question is pretty simple:
21 What specific defamatory statements do you allege
22 that Taylor Thomson made about you?

23 A. I would say objection. Asked and answered.
24 I answered that question previously.

25 Q. Okay. Joe, do you want to ask some of the

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1 crypto-related questions?

2 EXAMINATION BY MR. EVANS, COUNSEL FOR PLAINTIFF

3 MR. EVANS:

4 Q. Hi, Ms. Richardson. Good afternoon. Can
5 you hear me okay?

6 A. Yeah, I can. Thanks.

7 Q. All right. I'm going to ask some questions
8 that focus primarily on the crypto activities. Did
9 you ever receive any payments from Persistence?

10 A. I did not receive a payment from
11 Persistence, no -- I mean, well --

12 (Simultaneous colloquy.)

13 A. Hold on. Let me rephrase the question. I
14 don't want to box myself in in a way that you can
15 take later out of context. So I would say that, as
16 is well documented, there were tokens set aside.
17 There was no monetary payment ever made. There was
18 an allocated amount of tokens at the time of
19 purchasing that were set aside. I don't consider
20 that to be a payment because it wasn't realized, and
21 there was no payment in currency of any form. But
22 there was an allocation of tokens that were set
23 aside.

24 Q. So when you are talking about "tokens," we
25 are referring to XPRT. Is that right?

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1 A. That's correct.

2 Q. So let's not get hang up on -- let's not
3 get hung up on the word "payment." But there were
4 XPRT tokens transferred from Persistence to a wallet
5 that you controlled. Is that right?

6 A. I wouldn't say that I controlled it. It
7 was, you know, one of the wallets amongst all the
8 wallets.

9 Q. At the time you received the XPRT, did
10 anyone else have control of the wallet?

11 A. Taylor would have had access to it with the
12 keys that were provided to her.

13 Q. Didn't you have the keys at the time that
14 you received the transfer of the XPRT?

15 A. I also did, yes.

16 Q. Okay. So let's just go through a couple of
17 the -- a couple of the more specific transactions.
18 Persistence paid you for bringing investors to it.
19 Isn't that right?

20 A. No, that's not correct.

21 Q. Okay. And there was a specific percentage
22 of the investment of an investor you introduced that
23 was going to be sent to you in XPRT. Isn't that
24 right?

25 A. I -- I object to the question because

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1 it's -- it's speculative, and it also calls for
2 facts not in evidence.

3 Q. I'm not sure what the objection is. And to
4 be clear, Ms. Richardson, at a deposition, you can
5 only object on the basis of privilege, not on the
6 basis of the other things that you are referring to,
7 like speculation, facts not in evidence. Those are
8 not valid objections at a deposition. But let's
9 just make it simple.

10 A. Objection to form is a valid objection at a
11 deposition and --

12 Q. You can object to -- you can object to
13 form, and then you must answer the question. But
14 let's not get hung up on it. Let's just get to
15 the -- let's just get to the facts. So let's pull
16 up the first text message, please, from Tushar to
17 Ashley. Who is Tushar Aggarwal?

18 A. I'm sure there are many Tushar Aggarwals.
19 The Tushar Aggarwal in question, I believe, is
20 the -- I don't know what his exact title was, but he
21 was a senior representative at Persistence
22 Technologies. I can't see the screen, just FYI.

23 Q. Oh, okay.

24 A. There's just a really big glare.

25 (Simultaneous colloquy.)

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1 MR. HARRISON: There's a glare, so I'm
2 going to close the blinds and then --

3 MR. EVANS: Okay.

4 THE WITNESS: If you have a -- I don't know
5 if you have a written -- print copy. That might be
6 better.

7 MR. EVANS:

8 Q. It's only a couple of lines. I think we'll
9 just pull it up big.

10 Go to page 16, Campbell, please.

11 A. You would have to go a lot -- my eyes are
12 not great, so you'd have to go a lot bigger than
13 that. But if you have a printed copy, that might be
14 better.

15 Q. Josh, it is tab 125.

16 A. Thank you.

17 Q. Page 16, Josh.

18 MR. YIM: Okay.

19 THE WITNESS: Okay. I have a copy.

20 MR. EVANS:

21 Q. Okay. Great. And so I would like to
22 direct your attention to the text under 348. It
23 says: "To clarify, per my discussion with her, she
24 will be receiving a rate of five per XPRT. And the
25 remainder, I believe 1.1 percent, is going as a

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1 finder's fee to be a separate wallet to be vested
2 with her amount." Do you see that?

3 A. I see that, yes.

4 Q. Okay. That 1.1 percent finder's fee, that
5 was for you, wasn't it?

6 A. That was -- that was not quantifiable.

7 Q. I'm sorry. Can you repeat yourself.

8 A. That -- that wasn't -- that was never a --
9 certain that it was going to go to me.

10 Q. It was never certain that it was going to
11 go to you? Is that what you said?

12 A. That's correct.

13 Q. When Ms. Thomson made her investment,
14 Tushar sent you the XPRT in a separate wallet,
15 didn't he?

16 A. When Ms. Thomson made the investment, a
17 portion was set aside, correct, that was not -- that
18 was not mine. It was -- Taylor and I discussed that
19 if she was in profit later, that it was -- it was --
20 I was hoping that it would go to me, but it wasn't a
21 certainty.

22 Q. Well, in fact, this -- this finder's fee,
23 this 1.1 percent, that wasn't in any of the written
24 contracts between Ms. Thomson and Persistence, was
25 it?

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1 A. I -- I don't believe it was, but it was
2 always considered to be Taylor's asset.

3 (Reporter clarification.)

4 Q. It was sent to a separate wallet, not sent
5 to the same wallet that Taylor had for her XPRT.
6 Isn't that right?

7 A. No, that's incorrect. There were many
8 wallets. So to assume that one wallet is -- is not
9 hers amongst many wallets, I wouldn't agree with
10 that.

11 Q. You never gave it to her, did you?

12 A. It was one of -- it was one of the ones
13 that she had the keys with, I believe.

14 Q. That's not the question. I said did you
15 ever give it to her?

16 A. I -- I don't recall if I did or not. I
17 gave her a number of wallets.

18 Q. All right. Let's scroll down to 406.
19 Tushar says: "You can control the 1.1 percent on
20 your end. We can make it very clean." The
21 1.1 percent on your end, that's the finder's fee for
22 you. Isn't that right?

23 A. I don't believe that's what it means
24 necessarily. I think that it's being taken out of
25 context. I think everything was on, I think, my

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1 end. I think --

2 Q. Well, Taylor bought the tokens, the XPRT,
3 and you were getting paid for bringing Taylor to
4 Persistence. Isn't that right?

5 A. No, that's not correct.

6 Q. It says at 4:06: "If you give your
7 Persistence address, 1.1 percent of the coins can be
8 directly sent to you."

9 A. Yes, it says that.

10 Q. And, in fact, he did send the 1.1 percent
11 directly to you, didn't he?

12 A. I'm not clear with how to answer the
13 question because you could say that everything that
14 was sent was sent to me because I was holding all of
15 the wallets and --

16 Q. Well, there was a -- there was a contract
17 in which Taylor would receive a significant amount
18 of XPRT, and silent from the contract was the
19 1.1 percent that you were sent on the side to your
20 own personal wallet. Isn't that right?

21 A. No, I wouldn't say it was my own personal
22 wallet. I think that this -- this question that you
23 are asking absent the context is misleading,
24 which --

25 Q. Well, what's the context?

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1 A. The context being what I have -- what I
2 have said multiple times, which was this was an
3 amount that was set aside. It was to be realized
4 after the vesting period, which was a year, if she
5 was in profit. It wasn't --

6 Q. What's a finder's fee?

7 A. What's a finder's fee?

8 Q. Yeah.

9 A. My understanding was that it kind of went
10 both ways, but I don't have a clear concept of
11 exactly what the meaning of "finder's fee" is. It
12 was something that happened, to be clear, after the
13 fact of the purchase. It didn't happen before the
14 purchase.

15 Q. No, I'm just asking what a finder's fee is.
16 What is a finder's fee?

17 A. I can tell you my limited definition based
18 on my limited knowledge because I don't feel like
19 I'm an expert in this area to answer the question.
20 But what I would -- so I would caveat it with I'm
21 not sure that this is the accurate answer. But my
22 understanding of what a finder's fee would be is
23 if -- it's kind of, like, similar to if somebody
24 brought -- you know, introduced someone to a
25 project. It goes both ways, really.